UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Comments on Interim Report for Harvey & Knott Drum Site

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TO: Paula Retzler
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As we discussed in this morning's meeting, concentrations of some contaminants at the site may be hazardous to human health, depending on which routes of exposure are considered.

In on-site groundwater, the following contaminants exceeded health-based levels (assuming residential use as potable water) in the most recent available samples: methylene chloride, benzene, bis(2-ethylhexyl)phthalate, toluene, and lead. Some grossly contaminated wells have not been sampled since 1985, and there is no reason to think they have improved since then.

Although there is no current residential use of this aquifer, the cleanup goals should consider possible future uses. Therefore, we can (1) assume the groundwater will be available for future use and remediate it to health-based levels, or (2) demonstrate that the contaminated groundwater is intercepted by the downgradient wetland (with no harm resulting), and place a deed restriction on the property preventing groundwater use.

For on-site soils, the samples indicate very high lead levels (thousands of ppm) in a few samples, and background levels in the rest. The lead concentrations in the hot spots present an unacceptable health risk under any conceivable exposure scenario, and will need some kind of cleanup. We discussed the possibility of on-site burial (assuming Kathy is satisfied that groundwater quality would be protected). However, this option would require a companion deed restriction to prevent any kind of digging. If the hot spots are as limited as they seem, removal to a secure landfill may be more cost-effective and protective.

There seems to be little point in re-writing the baseline risk assessment, which was done under the old EPA guidance and should be conservative. I suggest a focused study of groundwater level and quality and lead hot spots in soil, with risk-based cleanup goals for groundwater and soil calculated under current EPA guidance.

Let me know if I can provide any other assistance with this site.